(ALEXANDRIA DIVISION) JAY NEDRY, et al.,

CASE NO.: 1:11-cv-878-LMB/IDD

Plaintiffs, v. GUNNAR NELSON, et al., Defendants.

e 1:11-cv-00878-LMB

## MOTION TO WITHDRAW AS COUNSEL OF DION-KINDEM & CROCKETT

## AND MATTHEW McCONNELL

Dion-Kindem & Crockett and Matthew McConnell, counsel of record for Plaintiffs, pursuant to Local Civil Rule 83.1(G), hereby move this Court for an order

allowing counsel to withdraw as counsel for Plaintiffs forthwith on the grounds that there has been an irreconcilable breakdown in communication between counsel and

A Memorandum Brief, Proposed Order and Declaration of William E. Crockett

Plaintiffs, such that counsel cannot adequately represent Plaintiffs in this matter.

in support of this Motion are being filed with this Motion,

THE MOVING PARTIES REQUEST A HEARING ON THIS MOTION, AND

A NOTICE OF HEARING WILL BE FILED FOLLOWING CONSULTATION

WITH DEFENDANT'S COUNSEL FOR AN AGREED HEARING DATE.

e 1:11-cv-00878-LMB -IDD Docu DATE: March 7, 2012	ment 38 Filed 03/07/12 Page 2 of 2 PageID#  By:  Matthew S. McConnell, Esq.  Virginia State Bar #28977  6116 Rolling Road, Suite 209  Springfield, Virginia 22152  Phone: (703) 451-9941  Fax: (703) 923-9445  Co-Counsel for Plaintiffs
DATE: March 7, 2012	/s/ William E. Crockett  By:  William E. Crockett (CA Bar No.129383) 21271 Burbank Blvd. Suite 100  Woodland Hills, CA 91367  Phone: (818) 883-4400  Fax: (818) 676-0246  Counsel for Plaintiffs
CERTIFICATE OF SERVICE	
	t a true and correct copy of the foregoing was served, first class, postage prepaid this 7 <sup>th</sup> day of March,
Robert Draim Hudgins Law Firm 515 King Street, Suite 400 Alexandria, Virginia 22314 Counsel for Defendant Gunnar Nel	son
VIA OVERNIGHT MAIL ONLY Jay C. Nedry 23476 NEW MOUNTAIN RD Aldie, Virginia 20105	
DATE: March 7, 2012	/s/ Matthew S. McConnell By: Matthew S. McConnell, Esq. Virginia State Bar #28977 6116 Rolling Road, Suite 209 Springfield, Virginia 22152 Phone: (703) 451-9941 Fax: (703) 923-9445 Co-Counsel for Plaintiffs